City Planning Commission Meeting – May 26, 2015

CONSIDERATION – SUBDIVISION DOCKET 022/15

Applicant: Turnbull Bakeries Inc. of La.

Prepared By: Stephen Kroll Date: May 13, 2015

Deadline: May 3, 2015 (Deadline extended at applicant's request to allow re-

subdivision proposal to be considered concurrently with a related zoning

change application)

GENERAL INFORMATION

Proposal: Re-subdivision of Lots 1, 2, 3, 4, 97, 100, 101, 102, 102 or 6, 103, 104,

105, 106, 107, 108, and 109 into proposed Lots 1A, 2A, 3A, 97A, 100A, 101A, 102A, 102B, 103A, 104A, 105A, 106A, 107A, 108A, and 109A,

and the dedication of a 12' servitude.

Location: Square 46, in the Fourth Municipal District, bounded by First, Saint

Thomas, Soraparu, and Rousseau Streets. The municipal addresses are 523 First, 2352-2354 Saint Thomas Street, and 520-546 Soraparu Street. The

site is within the Irish Channel Local Historic District. (PD 2)

Zoning: LI Light Industrial District. The site is proposed to be re-zoned to an RD-3

Two-Family Residential District (Zoning Docket 049/15), which is being

considered concurrently with this re-subdivision application.

Current

Land Use: The site includes sixteen lots that form most of the site of Turnbull Bakeries, an industrial bakery located on First Street in the Irish Channel.

In total, the lots, which range between 26' and 33'-2" in width and 82'-10" and 183'-6" in depth, form a 61,492.67 square foot (1.41 acre) parcel.

The parcel is developed with Turnbull Bakeries' masonry and metal industrial structures, which are built to or near all property lines, occupying virtually the entire parcel. (The Turnbull Bakeries site also includes three lots, Lots 15A, 93, and 96A, which are not part of this application). Turnbull Bakeries ceased operation in late 2012 and the

industrial structures occupying the site are no longer in use.

Proposed

Land Use: The applicant now requests that the sixteen lots be re-subdivided into

fifteen new lots facing Saint Thomas, First, and Soraparu Streets. The existing warehouse structures on the site are to be demolished and the new

lots are to be developed with single-family residences.

Required:

This redevelopment proposal requires the City Planning Commission to act on two separate applications. First, the re-subdivision of the existing 16 lots into 15 new lots is a major subdivision and therefore must be considered by the Commission in accordance with Article 3, Section 3.1.2 of the Subdivision Regulations. It is to be reviewed as a Policy C subdivision in accordance with Article 3, 3.2.3 of the Subdivision Regulations, which allows for the approval after a public hearing of major subdivisions which do not involve any changes in street patterns. This report reviews the proposal's compliance with the applicable requirements contained within the Subdivision Regulations, the Comprehensive Zoning Ordinance, as well as the comments of other departments and agencies.

Second, because the existing LI Light Industrial District does not allow residential use by right, the applicant has requested a zoning change to allow the new lots to be developed for residential use by right. The applicant proposes that an RD-3 Two-Family Residential District which surrounds the LI District and includes most residential properties in the Irish Channel be expanded to include the subject site. That zoning change application is considered under Zoning Docket 049/15

LOT SIZE

Existing Parcel:

The existing parcel is a 1.41 acre parcel formed by the 16 lots which front on First, Saint Thomas, and Soraparu Streets. The existing lots are described in the table below.

Existing Lots				
Lot	Width	Depth	Area	
1	27'	82'-10"	~2,240 sq. ft.	
2	26'-9"	84'-10"	~2,270 sq. ft.	
3	26'-10"	86'-10"	~2,330 sq. ft.	
4	29'-8"	89'-3"	~2,650 sq. ft.	
97	33'-2"	183'-6"	~6,090 sq. ft.	
100	33'-2"	183'-6"	~6,090 sq. ft.	
101	33'-2"	183'-6"	~6,090 sq. ft.	
103	31'-7"	120'-3"	~3,800 sq. ft.	
104	30'-6"	120'-3"	~3,670 sq. ft.	
105	30'-7"	120'-3"	~3,680 sq. ft.	
106	30'-7"	120'-3"	~3,680 sq. ft.	
107	30'-7"	120'-3"	~3,680 sq. ft.	
108	30'-7"	120'-3"	~3,680 sq. ft.	
109	26'	120'-2"	~3,120 sq. ft.	
102 or 6	30'	123'-4"	~3,700 sq. ft.	
102	30'	124'-5"	~3,740 sq. ft.	

Proposed Lots:

The re-subdivision proposes the re-subdivision of the 16 existing lots into 15 new lots fronting on First, Saint Thomas, and Soraparu Streets. The proposed lots are described in the table below.

Proposed Lots				
Lot	Width ¹	Depth ²	Area	
1A	30'-2"	120'	3,680.57 sq. ft.	
2A	29'-10"	120'	3,637.76 sq. ft.	
3A	26'	120'-2"	3,365.05 sq. ft.	
97A	30'	183'-4"	5,499.90 sq. ft.	
100A	30'	153'-2"	4,582.83 sq. ft.	
101A	39'-4"	153'-2"	6,022.65 sq. ft.	
103A	30'	120'-4"	3,609.52 sq. ft.	
102A	30'	152'-1"	4,570.38 sq. ft.	
102B	30'	153'-5"	4,848.89 sq. ft.	
104A	30'	120'-4"	3,610.57 sq. ft.	
105A	30'	120'-4"	3,611.62 sq. ft.	
106A	30'	120'-5"	3,612.66 sq. ft.	
107A	30'	120'-5"	3,613.71 sq. ft.	
108A	30'	120'-6"	3,614.76 sq. ft.	
109A	30'	120'-5"	3,611.82 sq. ft.	

ANALYSIS

Development in the Vicinity:

The petitioned site, in the Irish Channel neighborhood, is within an LI Light Industrial that includes the entirety of the subject square, Square 46, as well as one lot located along Soraparu Street on the adjacent Square 45. The subject square is occupied by the Turnbull Bakeries' vacant industrial structures on the subject site, which are to be demolished and replaced with the single-family residences; another single-story industrial building formerly used by Turnbull Bakeries on Lot 15A, which fronts on Soraparu Street and is immediately adjacent to the subject site to the Rousseau Street side; and Lots 96A and 93, which are two vacant lots owned by Turnbull Bakeries which front on First Street and are immediately adjacent to the site to the Rousseau Street side. The square also includes, at the intersection of Soraparu and Rousseau Streets, a single-story masonry industrial structure formerly owned by Turnbull Bakeries which is now used by Raphael Academy, a school oriented toward children with intellectual and developmental disabilities. Also on the square are a two-family Creole Cottage, three shotgun two-family residences, and a single-story warehouse structure on Rousseau Street; a single-

² Lot depth is defined by Article 2, Section 2.2 of the Subdivision Regulations as the average distance between a lot's front and rear property lines.

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¹ Lot width is defined by Article 2, Section 2.2 of the Subdivision Regulations as the distance between the side lot lines as measured at the required front yard setback line and parallel to the street right-of-way.

family Creole Cottage on First Street; and a two-story four-family residence on Soraparu Street. Additionally, there is a series of three vacant lots on Rousseau Street.

In addition to these properties on the subject square, the LI District also includes, on the adjacent Square 45, the site of the Waldorf School of New Orleans. Located at 517 Soraparu Street, the Waldorf School is a pre-school and elementary school occupying a historic three story masonry industrial structure adapted for residential use. The Waldorf School also has a small accessory parking area and outdoor yard areas.

This LI District is surrounded by an RD-3 Two-Family Residential District which spans most of the Irish Channel. Squares are divided into rectangular lots of varying size, but typically about 30 feet in width and most commonly about 120 feet in depth, though with significant variation. Individual lots are developed primarily by simple houses dating from the mid-to-late 19th century. These structures include single- and two-family Creole cottages and shotgun residences, often wth Victorian ornamentation popular at the time of their construction. There are also examples of corner commercial structures, many of which have been converted for residential use. Buildings are generally consistent in form, in their shallow setbacks, and in height, giving the building stock a remarkably uniform character. As they are typically built to or near front and side property lines, off-street parking spaces are typically not provided. Buildings of these types and are directly across First, Saint Thomas, and Soraparu Streets from the site and predominate on the surrounding squares. In addition, scattered examples of infill development can be found nearby, including recently constructed homes that are similar in design to the neighborhood's historic building stock, as well as a significant number of undeveloped lots. There are also occasional examples of institutional uses such as school as churches, as well as recreational uses, including Sorparu Playspot, which is located in the center of Soraparu Street between Tchoupitoulas and Rousseau Streets.

In addition to the LI District in which the subject site is located and the RD-3 District that surrounds it, the area also includes an HI Heavy Industrial District that includes two square located along Tchoupitoulas Street between Jackson Avenue and Soraparu Street and an LI District by an LI Light Industrial District which extends along the bank of the Mississippi River, including the various port and maritime facilities along the river, as well as those industrial properties along the lake-side of Tchoupitoulas Street and just off of Tchoupitoulas Street. These districts are occupied by industrial buildings that range in age and size, including a pair of relatively tall historic structures standing four and five stories in height, respectively, and, more commonly, single- and two-story warehouse structures constructed of metal and masonry and of varying age. The districts include primarily industrial and warehousing uses, largely within those structures but also occupying outdoor open storage areas.

Compliance with the Comprehensive Zoning Ordinance and the Subdivision Regulations:

Lot size requirements

In accordance with Article 5, Section 5.1.1 of the Subdivision Regulations, subdivision proposals must be compliant with the Comprehensive Zoning Ordinance. As part of this, new lots generally must meet the minimum lot width, depth, and area requirements of the zoning district in which they are located. (The exception to this general rule is for new lots created under Policies B, E, and G, none of which apply to this application.) This section reviews compliance with the minimum lot size requirements of the existing Comprehensive Zoning Ordinance, which is currently in effect, and the new Comprehensive Zoning Ordinance, which was adopted by the City Council and, if signed by the Mayor, would go into effect 90 days following the Mayor's signature. Given the impending effectiveness of the new zoning ordinance, it is appropriate for this subdivision proposal to be evaluated with the new zoning ordinance in mind.

Current Comprehensive Zoning Ordinance

Though currently zoned LI Light Industrial District, the site is proposed by the applicant to be re-zoned to an RD-3 Two-Family Residential District. In accordance with **Article 4**, **Section 4.6.7** and **Table 4.F** of the Comprehensive Zoning Ordinance, lots in the RD-3 District that are to be developed with single- or two-family residences are to measure at least 30 feet in width, 90 feet in depth, and 3,600 square feet in area.

Thirteen of the fifteen proposed lots would be compliant with these requirements. Two lots (proposed Lots 2A and 3A) would be slightly substandard in at least one respect. Proposed Lot 2A would be substandard in width, as it is to measure 29 feet, 10 inches in width³. Proposed Lot 3A would be substandard in width and area, as it is to measure 26 feet in width and 3,365.05 square feet in area.

New Comprehensive Zoning Ordinance

Under the new Comprehensive Zoning Ordinance, the site would be within an MU-1 Medium Intensity Mixed-Use District. In accordance with Article 15, Section 15.3 and Table 15-2, lots in the MU-1 District which are to be used for single-family residential purposes must be at least 3,000 square feet in area. The MU-1 District does not have minimum lot width or depth requirements for lots developed with single-family residences. All of the proposed lots are to be over 3,000 square feet in area and therefore would be compliant with the new Comprehensive Zoning Ordinance's minimum lot size requirement.

³ In accordance with **Article 2, Section 2.2** of the Subdivision Regulations, a lot's width is measured at the required front setback line. For the proposed lots along Saint Thomas Street, the required front setback line is 20 fect from the front property line and parallel to the front property line.

The staff believes that although proposed Lots 2A and 3A are slightly substandard of the lot size requirements of the Current Comprehensive Zoning Ordinance, those requirements should be waived to allow the proposed lots. The staff believes this is appropriate because the lots will be compliant with the new Comprehensive Zoning Ordinance, which will be effective in August, and therefore should be considered to be appropriate in size for their location.

It should also be noted that the slightly substandard Lots 2A and 3A would be normal in size for the Irish Channel. Subdivided and developed long before the adoption of zoning regulations, the Irish Channel features significant range in the size of lots. Lots are generally rectangular in shape and most commonly about 30 feet in width and 120 feet in depth, but many lots are moderately smaller or larger. This includes many existing lots which are substandard of the current zoning ordinance's lot size requirements. As with most lots in the Irish Channel, most of these substandard lots were historically used for residential purposes.

The common occurrence of slightly substandard lots which are historically and/or currently used for residential purposes is illustrated on the site and by neighboring properties across Saint Thomas Street from it. Of the sixteen existing lots forming the site, all were originally used for residential or corner-store commercial purposes. These include five lots (Lots 1, 2, 3, 4, and 109) which are substandard the RD-3 District's minimum lot size requirements in width, depth, and/or area. Each of these lots was originally developed with a residential structure, as indicated by the 1895-1896 Sanborn map.

While those lots were originally incorporated in the Turnbull site for industrial use, this pattern of substandard lots developed with residences still exists in the neighborhood. For example, of the six properties on the opposite side of Saint Thomas Street from the site, three are substandard in size (formed by one or two lots) and are developed with residences. The three substandard properties include 601 First Street, 2353 Saint Thomas Street, and 2357 Saint Thomas Street.

The staff therefore believes that although proposed Lots 2A and 3A would both be substandard of the RD-3 District's lot size requirements in at least one respect, since the lots would be compliant with the new zoning ordinance's MU-1 District and would be normal for the area given the common occurrence of slightly substandard lots, waivers of the RD-3 District's requirements should be granted to allow Lots 2A and 3A as proposed.

Although the staff believes the Commission should approve the re-subdivision with Lots 2A and 3A as proposed, it does not have the authority to grant the waivers of the RD-3 District's lot width and area requirements that are needed to allow the substandard lots. Rather, it can only approve the subdivision tentatively, with final approval contingent on the waivers of those lot width and area requirements by the Board of Zoning Adjustments, which has the authority to grant those waivers.

• The applicant shall apply for and secure variances from the Board of Zoning Adjustments for insufficient lot width for proposed Lot 2A and insufficient lot width and area for proposed Lot 3A.

In addition to these lot size requirements, **Section 5.5** of the Subdivision Regulations also contains requirements for the shapes of proposed lots. The proposal is generally compliant with the requirements of that section. The only conflict with that section involves the discouragement of reversals of lot frontage in **Section 5.1.8**. That section discourages changes in lot frontage which cause required rear yards to abut required side yards. This re-subdivision would replace existing Lots 1, 2, 3, and 4, which face Soraparu Street, with proposed Lots 1A, 2A, and 3A, which would front Saint Thomas Street. The required rear yards of Lots 1A, 2A, and 3A would abut the required side yard of the adjacent proposed Lot 102A, which would face Soraparu Street.

This change in lot frontage is acceptable. All other existing and proposed lots along Saint Thomas Street face Saint Thomas Street and so it is sensible for proposed Lots 1A, 2A, and 3A to align with them by also facing Saint Thomas Street. While this would cause Lots 1A, 2A, and 3A to have required rear yards abutting the required side yard of proposed Lot 102A, this is no more objectionable of the existing condition, where the required rear yards of existing Lots 1, 2, 3, and 4 abut the required side yard of Lot 109. It is also typical in the neighborhood for the rears of lots facing one street to abut the sides of lots facing other streets, just as would be the case here. For these reasons, the staff finds it to be appropriate for Lots 1A, 2A, and 3A to face Saint Thomas Street rather than Soraparu Street.

• The applicant shall be granted a waiver of **Article 5**, **Section 5.1.8** of the Subdivision Regulations, which generally discourages reversals of lot frontage, to allow proposed Lots 1A, 2A, and 3A to face Saint Thomas Street.

Design standards and principles of acceptability

The subdivision is consistent with the applicable design standards and principles of acceptability enumerated in **Article 5** of the Subdivision Regulations, which relate to the size and arrangements of lots, blocks, the characteristics of streets and sidewalks, and other miscellaneous requirements. Many of requirements governing street characteristics are oriented toward entirely new streets and ensuring that they are of sufficient width and adequately connect with the existing street system. Since this subdivision involves the resubdivision of lots within an existing square and street network, most of these requirements are not applicable to this proposal.

Landscaping

Article 6 of the Subdivision Regulations includes standards for the construction of streets and utilities, including water lines and sewer lines, as well as the landscaping of the street right-of-way. Again, because this site is within an established urban environment with an existing infrastructure, most of these standards do not apply to this proposal. The only

applicable requirement is the requirement in **Section 6.9.3** which mandates that the applicant for a major subdivision install landscaping within the existing street right-of-way (where landscaping is not already present) adjacent to the proposed lots.

- The applicant shall submit a landscape plan prepared by a licensed Louisiana landscape architect indicating the planting of new trees and vegetation in the Saint Thomas, First, and Soraparu Street rights-of-way adjacent to the site, in accordance with the requirements of **Article 6**, **Section 6.9.3** of the Subdivision Regulations. The landscape plan shall be subject to the review and approval of the staff of the City Planning Commission and the Department of Parks and Parkways.
- All required landscaping of the public right-of-way shall be completed prior to the
 issuance of a Use & Occupancy Certificate for any structures constructed on any
 lots. The landscaping may be installed on a lot by lot basis. It is the responsibility
 of the applicant to inform and declare this requirement to any purchasers or
 developers of said lots. A note should be added to the final subdivision plan
 reflecting this requirement.

Municipal addresses

In accordance with normal procedures, municipal addresses for all lots are to be assigned by the Department of Safety and Permits. The re-subdivision survey will have to be revised to include the addresses assigned by the Department of Safety and Permits.

• Municipal addresses for each of the proposed lots shall be assigned by the Department of Safety and Permits. These municipal addresses shall be placed on the subdivision plan by the surveyor.

Utilities & Regulatory Agencies:

The City Planning Commission, when reviewing a proposed subdivision, requests written responses from the Department of Property Management Division of Real Estate and Records, Department of Public Works, Department of Safety and Permits, Sewerage and Water Board, Entergy, and the Historic District Landmarks Commission (where applicable) regarding the compliance of the proposed subdivision with the building codes, zoning ordinance, and other regulatory documents governing development in the city.

As of the writing of this report, the representative of the Department of Safety and Permits noted that they survey needs to be revised to show the existing structures on the site. The representative of the Department of Property Management, Division of Real Estate and Records noted that it would require a full size survey to review, which the City Planning Commission staff has agreed to supply to it. The representative of the Sewerage and Water Board indicated that sewer and water facilities are available but not shown on the re-subdivision plan. It also noted that sewer and water house connections are not

shown and, therefore, a note should be made on the survey stating that sewer and water house connections are the responsibility of the property owner. The representative of the Sewerage and Water Board stated that subsurface drainage is available but now shown for all lots except proposed Lots 3A, 105A, 106A, 107A, 108A, and 109A.

At the time of this writing, the Historic District Landmarks Commission had not provided written comments regarding the proposal.

Planning Advisory Committee

In addition to providing written comments, representatives of City departments were asked to comment on the subdivision proposal at the Planning Advisory Committee meeting of May 6, 2015. The representative of the Historic District Landmarks Commission had no comments regarding the subdivision proposal itself but noted that any structures which are to be constructed on the proposed lots would have to be reviewed and approved by the Historic District Landmarks Commission. None of the other departmental representatives present at the meeting had any comments regarding the proposal. The Committee passed a motion of no objection subject to further review by the City Planning Commission.

PLAN FOR THE 21ST CENTURY

Are the proposed actions supported by or in conflict with the policies and strategies of the *Plan for the 21st Century: New Orleans 2030*?

The Home Rule Charter of the City of New Orleans requires all land use actions (including subdivision) to be consistent with the Master Plan. A land use action is consistent with the Master Plan if it furthers, or at least does not interfere with, the goals, policies, and guidelines in the Land Use Element of the Master Plan and is compatible with the uses, densities, and intensities of the designation of its site on the future land use map.

The Master Plan's future land use map ("Chapter 14: Land Use Plan" of the Master Plan) designates this site for **Mixed-Use Medium Density** future land use. The goal, range of uses and development character for the Mixed-Use Medium Density designation is copied below:

MIXED-USE MEDIUM DENSITY

Goal: Create medium-density neighborhood centers to enhance walkability and serve as focal points within neighborhoods. Proximity to transit encouraged.

Range of Uses: Medium-density single-family, two-family and multifamily residential and commercial uses. Limited light industrial uses (craft and value added industry and passive warehousing and storage) may be allowed in some areas.

Development Character: Height/mass, and density of new development varied to ensure proper transitions to surrounding lower density residential neighborhoods. Many structures will feature ground floor retail with residences on upper floors.

The proposed re-subdivision of the site for residential development is **consistent** with the Mixed-Use Medium Density designation, as that designation is intended for single- and two-family residential development, as well as multiple-family residential, commercial, and limited light industrial use.

SUMMARY

Subdivision Docket 022/15 considers the re-subdivision of the Turnbull Bakeries site on First Street in the Irish Channel into fifteen lots which the applicant proposes to develop with single-family residences. As part of the redevelopment proposal, the applicant proposes to rezone the site from its current zoning as an LI Light Industrial District to an RD-3 Two-Family Residential District, which would allow the proposed lots to be developed with both single- and two-family residences. The proposal is mostly consistent with the regulations of the proposed RD-3 District and with the applicable requirements of the Subdivision Regulations. The lots would be appropriate for their location in the Irish Channel in size, shape, and their orientation toward the adjacent streets.

While mostly consistent with the applicable regulations, the proposal is not fully compliant with the applicable regulations in two respects. First, of the fifteen proposed lots, two (proposed Lots 2A and 3A) are slightly substandard of the RD-3 District's minimum lot size requirements. The staff believes that the lots are nonetheless acceptable in size because they are compliant with the lot size requirements of the MU-1 Medium Intensity Mixed-Use District, the zoning district that is to be applied to the site by the new zoning ordinance. Additionally, they would be normal in size for their location in the Irish Channel.

The second respect in which the proposal is not fully compliant relates to the Subdivision Regulations' general discouragement of re-subdivisions that result in changes in lot frontage. This re-subdivision would result in a change in the frontage of several lots at the intersection of Soraparu and Saint Thomas Streets from Soraparu Street to Saint Thomas Street. This change in lot frontage is acceptable as the other lots along Saint Thomas Street face Saint Thomas Street and so this change in lot frontage would cause the lots at the corner to align with those other lots facing Saint Thomas Street. For these reasons, the staff finds the re-subdivision proposal to be appropriate and recommends its approval.

PRELIMINARY STAFF RECOMMENDATION⁴

The staff recommends that the City Planning Commission grant **tentative approval** of Subdivision Docket 022/15 with final approval subject to one (1) waiver and seven (7) provisos:

Waiver

1. The applicant shall be granted a waiver of **Article 5**, **Section 5.1.8** of the Subdivision Regulations, which generally discourages reversals of lot frontage, to allow proposed Lots 1A, 2A, and 3A to face Saint Thomas Street.

Provisos

- 1. The applicant shall apply for and secure variances from the Board of Zoning Adjustments for insufficient lot width for proposed Lot 2A and insufficient lot width and area for proposed Lot 3A.
- 2. The applicant shall submit a landscape plan prepared by a licensed Louisiana landscape architect indicating the planting of new trees and vegetation in the Saint Thomas, First, and Soraparu Street rights-of-way adjacent to the site, in accordance with the requirements of **Article 6**, **Section 6.9.3** of the Subdivision Regulations. The landscape plan shall be subject to the review and approval of the staff of the City Planning Commission and the Department of Parks and Parkways.
- 3. All required landscaping of the public right-of-way shall be completed prior to the issuance of a Use & Occupancy Certificate for any structures constructed on any lots. The landscaping may be installed on a lot by lot basis. It is the responsibility of the applicant to inform and declare this requirement to any purchasers or developers of said lots. A note should be added to the final subdivision plan reflecting this requirement.
- 4. Municipal addresses for each of the proposed lots shall be assigned by the Department of Safety and Permits. These municipal addresses shall be placed on the subdivision plan by the surveyor.
- 5. The applicant shall comply with any requirements deemed necessary by Entergy, the Sewerage and Water Board, the Departments of Public Works, the Department of Property Management, Division of Real Estate and Records, the Historic District Landmarks Commission, and the Department of Safety and Permits.

⁴ The preliminary staff recommendation is subject to modification by the City Planning Commission

- 6. The applicant shall comply with all other Subdivision Regulations, which includes the submittal of mortgage certificates, a consent letter from the mortgage company (if applicable) and tax certificates for the petitioned site.
- 7. The applicant shall submit a reproducible copy and two (2) prints and a digital copy of the final resubdivision survey in dwg., dfx, or ESRI compatible file format.

REASON FOR RECOMMENDATION

1. The proposal is generally consistent with the applicable requirements of the Subdivision Regulations and the existing and new Comprehensive Zoning Ordinances. It would allow for the site to be redeveloped in a residential manner consistent with the predominantly residential character of the Irish Channel neighborhood in which it is located.





